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July 21, 2006

***Via CM/ECF and Hand-Delivery***

The Honorable Kent A. Jordan  
United States District Court of Delaware  
844 N. King Street  
Wilmington, DE 19801

RE: ***St. Paul Travelers Companies, et al. v. Walpar, Inc.***  
***C.A. No. 05-880 (KAJ)***

Dear Judge Jordan:

I write to advise the Court of an issue that has come to my attention subsequent to the case scheduling conference on July 6, 2006. As Your Honor may be aware, at the time of the call my firm had only recently been retained by Specialty Service Contractors, Inc. ("Specialty"), a third party defendant in the instant matter. At the time of the call, I did not have a complete understanding of the scope of the claims and defenses Specialty will pursue in this action. During the conference, the Court assigned my client 4 hours to present its case based, in part, on my misunderstanding that Specialty would be a minor player in this litigation.

Subsequent to the call, I have been able to review relevant documents and discuss the case in depth with my client. On behalf of Specialty, I intend to file an answer to the third party complaint and claims against Daisy Construction, Co. and St. Paul Insurance, Co. In light of these developments, I respectfully request that the Court increase Specialty's allotment of time to present its case. One solution may be to afford Specialty the benefit of the full fourth day that the Court has set already aside for this case. I have spoken with opposing counsel but could not reach an agreement. Consequently, I request the Court schedule a brief teleconference to re-visit the issue of trial time as it relates to my client.

Counsel is available at the call of the Court to discuss this issue further.

Respectfully submitted,

  
Scott G. Wilcox

cc: James D. Heisman, Esq. (via Hand-Delivery & CM/ECF)  
Kevin W. Goldstein, Esq. (via CM/ECF)  
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